



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 05 2014

REPLY TO THE ATTENTION OF:

E-19J

Catherine Batey
Division Administrator
Illinois Division
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

**RE: Supplemental Draft Environmental Impact Statement for the U.S. Highway 30
(Illinois Highway 135 to Illinois Highway 40) Project, Whiteside County, Illinois –
CEQ No. 20140264**

Dear Ms. Batey:

The U.S. Environmental Protection Agency has reviewed the referenced Supplemental Draft Environmental Impact Statement (SDEIS), which was prepared by the Federal Highway Administration (FHWA) and the Illinois Department of Transportation (IDOT). Our review is pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

FHWA and IDOT propose adding additional infrastructure to the existing U.S. Highway 30 (U.S. 30) between Fulton, Illinois and Rock Falls, Illinois, as a measure to improve safety, reduce traffic congestion, provide for an anticipated increase in traffic demand, and establish roadway continuity similar to other segments of U.S. 30 in Illinois and Iowa. The entire project is twenty-four miles in length. Five alternatives have been proposed:

- No Build - No Action: No reconstruction or enhancements of the roadway would occur;
- Transportation Demand Alternative: Reduction of traffic by encouraging carpooling and use of public transportation;
- Transportation System Management Measures: Use of existing highway infrastructure to help alleviate or postpone the need to expand capacity. This alternative includes measures such as adding traffic signals, adding turn lanes, and revising road access;
- Build Alternative 4: Construct a four-lane expressway (utilizing parts of the existing U.S. 30 infrastructure), including a bypass north of Morrison; and
- Build Alternative 5: Construct a four-lane expressway (utilizing parts of the existing U.S. 30 infrastructure), including a bypass south of Morrison.


EPA commented on the Draft Environmental Impact Statement (DEIS) for this project on July 29, 2011. Thank you for addressing several of EPA's concerns on the project's DEIS¹, including installation of wildlife crossings and stormwater bioretention, use of native grasses that do not need routine maintenance, widening of floodplain crossings, and measures to provide stream bank stability and general erosion control. Also addressed in the SDEIS were our comments regarding a Morrison west bypass, presence of non-standard intersections, and reducing diesel emissions during project construction. We also commend FHWA and IDOT for reducing the proposed project's overall "footprint" between the DEIS and SDEIS.

Our DEIS comments regarding stormwater management were not adequately addressed. We note specifically that while stormwater management is adequately addressed for a present-day climate scenario, the proposed stormwater management approach does not adequately address future flood projections caused by the increasing frequency and intensity of storm events attributable to climate change.

We have also raised new concerns regarding the proposed project. Those include safety issues on Highway 78 in Morrison, missing consultation records, reuse of construction materials, adding greater detail to Exhibit 3-10, and constructing a Rock Falls bypass. Our enclosed detailed comments elaborate on these issues.

EPA previously rated the DEIS for this project as Environmental Concerns – Insufficient Information (EC-2). EPA is also rating the SDEIS as EC-2. This rating was assigned principally due to concerns about accommodating future stormwater scenarios. Therefore, the project may result in environmental impacts that can be avoided. A summary of our rating system, titled *Summary of Rating Definitions and Follow Up Action*, is enclosed. We look to the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) to commit to incorporating into project design and construction all mitigation measures mentioned in the EIS. EPA is available to discuss these SDEIS comments at your convenience. Please feel free to contact me or Mike Sedlacek of my staff at 312-886-1765 or by email at sedlacek.michael@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosures: U.S. Highway 30 Project Detailed Comments
Summary of Rating Definitions and Follow Up Action

cc: Paul Loete, Illinois Department of Transportation
Mark Nardini, Illinois Department of Transportation

¹ See IDOT response to EPA's DEIS comments, dated March 20, 2012, located in Appendix D of the SDEIS.

U.S. Highway 30 Project Detailed Comments

Climate Change and Stormwater Management

Changes in the amount of rain falling during storms provide evidence that the water cycle is already changing. Over the past 50 years, the amount of rain falling during the most intense 1% of storms increased by almost 20%². In accordance with Executive Order 13653, all Federal executive agencies shall “prepare the Nation for the impacts of climate change by undertaking actions to enhance climate preparedness and resilience.” FHWA guidance urges transportation planners to implement mitigation and adaptation into highway projects based on *projected future climate change*³.

The proposed project will result in an increase in impervious surfaces in the study area. This will increase the amount of stormwater runoff that will need to be collected and stored before natural infiltration can fully occur. However, the analyzed volume of stormwater in the SDEIS is based on current data, which should not be considered representative of future conditions.

Recommendation: Stormwater data from climate change models should be used to determine what volume of stormwater management capacity will be needed for this project during its useful life. That enhanced capacity should include enough storage to temporarily retain the volume of stormwater that is produced by 100-year and 500-year storm events.

Recommendation: Due to potential surface water quality issues, we recommend stormwater from bridges and roadway surfaces not be discharged directly to waters of the U.S. Rather, stormwater should be channeled toward green infrastructure that would allow road pollutants to be captured prior to discharge to surface waters.

Consultation Records

We appreciate the inclusion of consultation records in the SDEIS regarding historical and cultural resources, and state and Federal threatened and endangered species. However the SDEIS contained no consultation documents regarding wetlands.

Recommendation: We recommend including in the FEIS wetland consultation documents between the transportation agencies and the U.S. Army Corps of Engineers.

² See EPA guidance on climate change adaptation for the Midwestern U.S. at: <http://www.epa.gov/climatechange/impacts-adaptation/midwest.html>

³ See FHWA guidance on climate change adaptation for transportation projects at: http://www.fhwa.dot.gov/environment/climate_change/adaptation/ongoing_and_current_research/summary/index.cfm and http://www.fhwa.dot.gov/environment/climate_change/adaptation/publications_and_tools/vulnerability_assessment/framework/page00.cfm

Reuse of Construction Materials

The SDEIS does not discuss the potential to reduce, reuse, and/or recycle construction materials.

Recommendation: We recommend construction materials be reclaimed for future use for this project, or elsewhere. We also recommend recycling of other used construction material, such as metals and pavement materials. This should be done to the extent practical.

Exhibit 3-10

Pages 1-16 of Exhibit 3-10 show the right-of-way for the proposed alternatives. However, no drawings show the location and design features of interchanges, intersections, bridge locations, and the expressway itself.

Recommendation: We recommend Exhibit 3-10 (pages 1-16) be revised to show rough location and design features, such as interchanges and intersections, bridge locations, and the roadway footprint.

Highway 78 Safety in Morrison

Our DEIS comments requested FHWA and IDOT look into constructing a bypass around Morrison for Highway 78. As we understand, Highway 78 does not have enough traffic to warrant a bypass. However, Highway 78, which is a truck route, makes several 90-degree turns in downtown Morrison. This may present safety and operational problems with large trucks making those turns in the busy downtown area.

Recommendation: We request the FEIS discuss whether or not there are congestion and safety concerns on Highway 78 in downtown Morrison that warrant re-routing of the highway out of downtown Morrison to reduce congestion and increase safety.

Rock Falls Bypass

The SDEIS does not discuss the option of U.S. 30 bypassing Rock Falls, using the current alignment of the Interstate 88 (I-88) connector road, and I-88 between interchanges 36 and 44. While there does appear to be a need to improve traffic capacity on the west side of Rock Falls, the SDEIS is not clear why the alignment of U.S. 30 for the proposed action would increase safety and reduce congestion to a greater extent than utilizing a bypass. We believe safety will be greatly increased within Rock Falls by routing non-local traffic along a bypass route out of the city.

Recommendation: We recommend a bypass alternative for U.S. 30 be analyzed and considered in the FEIS using existing freeway infrastructure, including the I-88 connector road, and I-88 between interchanges 36 and 44. As a measure to reduce congestion and increase capacity, the existing U.S. 30 alignment (I-88 connector road to Prophetstown Road) in Rock Falls may then be upgraded to four lanes, and classified as a business route, thereby still conserving continuity between the local municipalities, while concurrently increasing safety in Rock Falls by routing non-local traffic onto existing roads that bypass Rock Falls.

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

